

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**(4) FELIPE ORDUNA-TORRES,  
(7) ARMANDO GNZALES-ORTEGA,**

**Defendants.**

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**Case No: SA-22-00366-OLG**

**GOVERNMENT'S OBJECTIONS TO DEFENSE EXHIBITS**

TO THE HONORABLE DISTRICT JUDGE ORLANDO GARCIA:

The United States of America hereby files its Objections to Defense Exhibits, and states:

In its Order Regarding PreTrial Matters (Doc. 331), this Court ordered the parties to file on or before Monday, February 24, 2025:

- (1) a “list disclosing any objections—and written explanation of the ground therefore—to the admissibility of exhibits. Any objections not disclosed by [then]—except for objections under Rules 402 and 403—shall be deemed waived unless permitted by the Court for good cause shown.
- (2) A list disclosing any anticipated objections—and written explanation of the grounds therefore—to witness testimony.”

**A. Objections to Proposed Exhibits**

The United States hereby objects to the following proposed exhibits and sets forth its reasons for the objection:

- |   |                                      |  |
|---|--------------------------------------|--|
| 1 | Permanent Resident Card              | No objection                                   |
| 2 | Demonstrative Burden of Proof Chart  | F.R.E. 402, 403, 901, Confusing, Argumentative |
| 3 | Demonstrative Defenses to Conspiracy | F.R.E. 402, 403, Confusing                     |

4	Demonstrative The Conspiracy	F.R.E. 901
5	Demonstrative Familia	F.R.E. 402, 403, 901
6	Demonstrative Family 1	F.R.E. 402, 403, 901
7	Demonstrative Family 2	F.R.E. 402, 403, 901
8	Demonstrative Family 3	F.R.E. 402, 403, 901
9	Demonstrative Family 4	F.R.E. 402, 403, 901
10	Demonstrative Family 5	F.R.E. 402, 403, 901
11	Demonstrative Family 6	F.R.E. 402, 403, 901
12	Orduna and Daughter	F.R.E. 402, 403, 901
13	Orduna and Daughter 2	F.R.E. 402, 403, 901
14	Orduna's Family	F.R.E. 402, 403, 901
15	Orduna's Small Family	F.R.E. 402, 403, 901
16	Ortega and Daughter	F.R.E. 402, 403, 901
17	Ortega and Family	F.R.E. 402, 403, 901
18	Ortega and Granddaughter	F.R.E. 402, 403, 901
19	Ortega and Granddaughter	F.R.E. 402, 403, 901
20	Ortega's Daughter	F.R.E. 402, 403, 901

## **B. Objections to Witness Testimony**

To date, Defendants have not notified the United States of any witnesses or expert witnesses it intends to call. The United States therefore objects to any defense expert witnesses without good cause being first found by the Court.

Respectfully submitted,

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/s/

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/s/

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been sent to the parties of record via the CM/ECF filing system.

/s/

ERIC J. FUCHS  
Assistant United States Attorney